

REMARKS

Applicants respectfully request consideration of the subject application as amended herein. This Amendment is submitted in response to an Office Action mailed on July 9, 2003. Claims 1-21 are rejected. Claims 1-4 and 8-21 have been amended. New claims 22-27 have been added. No new matter has been added.

The Examiner rejected claims 1-21 under 35 U.S.C. § 102(e) as being anticipated by Cesare (U.S. Patent No. 6,360,357, hereinafter "Cesare").

Cesare discloses a mechanism for allowing an end-user to define at run-time the way an object in the system will react to existing operations or events that are later performed on the object. The definition of the object's reaction is provided in Cesare by the user-specified software code. That is, the user in Cesare has to have programming skills and be able to create software code specifying the desired behavior of the object.

For example, Cesare describes as follows:

... the present invention provides a system, method and apparatus for allowing a user, without leaving the application in which he is working, to prepare code describing the behavior or other knowledge-based characteristic a specific object or feature should exhibit...

(Cesare, col. 2, lines 11-15).

At any time during the running of the CAD/CAM application program, a user may select an object... The user would then write code, for example by typing code on a keyboard input, specifying the behavior that is to be exhibited by the object... The user may write the code in any interpreted computer language, for example a scripting language.

(Cesare, col. 42, lines 21-39).

In the presently claimed invention, in contrast, the user does not need to be able to create software code specifying a desired behavior of an object. Instead, in the presently

claimed invention, multiple behavioral parameters associated with a design feature chosen by a user are identified and presented to the user. The user can then select desired behavioral parameters from the parameters presented to the user. These desired parameters are further used for modeling the design feature. That is, in the presently claimed invention, the user specifies the desired behavioral parameters by merely making a selection from a list of possible behavior parameters that are available for a specific design feature, thus relieving the user from a tedious task of creating software code to specify the behavior to be exhibited by the object.

In addition, Cesare does not teach or suggest having a modeling approach that is history-independent. In the presently claimed invention, in contrast, the modeling of the design feature is performed based on the context defined by the other design features of the same object. That is, in the presently claimed invention, the design features of the object have history-independent relationships.

Accordingly, Cesare does not teach or suggest at least the features of the present invention that are included in the following language of claim 1:

- ... identifying a plurality of behavioral parameters associated with a design feature selected by a user;
- presenting the plurality of behavioral parameters to the user;
- receiving user input identifying one or more behavioral parameters selected from the plurality of behavioral parameters by the user...

Similar language is also included in independent claims 11, 20 and 21. Thus, independent claims 1, 11, 20 and 21 are not anticipated by Cesare.

Claims 2-10 and 22-24 depend on independent claim 1 and include features that further limit claim 1, and claims 12-19 and 25-27 depend on independent claim 11 and include features that further limit claim 11. For example, new method claim 22, as well

as corresponding apparatus claim 25, includes a limitation of maintaining the functionality intended by the user for the design feature during the design process, thus further illustrating a history-independent approach of the present invention. New method claims 23 and 24, as well as corresponding apparatus claims 26 and 27, provide further details on the manner in which available behavioral parameters are presented to the user and what constitutes the user selection of the desired behavioral parameters, thus illustrating high level functionality specified by the behavioral parameters presented to the user for selection.

Accordingly, dependent claims 2-10, 12-19, 22-24 and 25-27 are not anticipated by Cesare based on the rationale provided with respect to independent claims 1 and 11 on which these dependent claims depend. Thus, Applicants respectfully submit that Applicants' invention as claimed in independent claims 1, 11, 20 and 21, and their corresponding dependent claims 2-10, 12-19, 22-24 and 25-27, is not anticipated by the above reference, and respectfully request the withdrawal of the rejection under 35 U.S.C. § 102(e).

In view of the foregoing amendments and remarks, Applicants respectfully submit that the pending claims are in condition for allowance. Applicants respectfully request reconsideration of the application and allowance of the pending claims.

If the Examiner determines that prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Marina Portnova at (408) 720-8300.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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